

KELLOGG, HUBER, HANSEN, TODD, EVANS & FIGEL, P.L.L.C.

SUMNER SQUARE

1615 M STREET, N.W.

SUITE 400

WASHINGTON, D.C. 20036-3209

(202) 326-7900

FACSIMILE:

(202) 326-7999

March 12, 2015

*Via ECF*

**MEMO ENDORSED**

The Honorable Denise L. Cote  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *NCUA v. Credit Suisse Securities (USA) LLC*, No. 13-cv-6736 (DLC) (S.D.N.Y.);  
*NCUA v. Credit Suisse Securities (USA) LLC*, No. 12-2648 (JWL-JPO) (D. Kan.)

Dear Judge Cote:

NCUA filed today a motion to compel Defendant Credit Suisse to respond adequately to NCUA's First Set of Interrogatories in the above-captioned matters. Exhibit B to that motion comprises Credit Suisse's responses to those interrogatories, which Credit Suisse designated as "Confidential" pursuant to the Master Protective Order (ECF No. 83) entered in these matters. Paragraph 9 of the MPO provides that:

In the event that before trial in the Related Actions, or in connection with any hearing in or any matter relating to the Related Actions, counsel for any Party determines to file or submit in writing to the Clerk's office any Protected Material, or any papers containing or making reference to the substance of such material or information, such documents or portions thereof containing or making reference to such material or information shall be filed with a request that the documents be filed under seal in accordance with the rules of the Court, and kept under seal until further order of the Court.

NCUA therefore respectfully requests permission to file that exhibit under seal, in accordance with this Court's Individual Practices in Civil Cases.

*Grant*  
*Denise Cote*  
*3/12/15*

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Respectfully submitted,

/s/ David C. Frederick

David C. Frederick  
Wan J. Kim  
Gregory G. Rapawy  
Andrew C. Shen  
KELLOGG, HUBER, HANSEN, TODD,  
EVANS & FIGEL, P.L.L.C.  
Sumner Square  
1615 M Street, N.W., Suite 400  
Washington, D.C. 20036  
Tel: (202) 326-7900  
Fax: (202) 326-7999  
dfrederick@khhte.com  
wkim@khhte.com  
grapawy@khhte.com  
ashen@khhte.com

George A. Zelcs  
KOREIN TILLERY LLC  
205 North Michigan Avenue, Suite 1950  
Chicago, IL 60601  
Tel: (312) 641-9750  
Fax: (312) 641-9751  
gzlcs@koreintillery.com

Stephen M. Tillery  
Greg G. Gutzler  
Robert L. King  
KOREIN TILLERY LLC  
505 North Seventh Street, Suite 3600  
St. Louis, MO 63101  
Tel: (314) 241-4844  
Fax: (314) 241-3525  
stillery@koreintillery.com  
ggutzler@koreintillery.com  
rking@koreintillery.com

Erik Haas  
Peter W. Tomlinson  
Henry J. Ricardo  
PATTERSON BELKNAP WEBB & TYLER LLP  
1133 Avenue of the Americas  
New York, NY 10036  
Tel: (212) 336-2000  
Fax: (212) 336-2222  
ehaas@pbwt.com  
pwtomlinson@pbwt.com  
hjr Ricardo@pbwt.com

David H. Wollmuth  
Frederick R. Kessler  
Steven S. Fitzgerald  
Ryan A. Kane  
WOLLMUTH MAHER & DEUTSCH LLP  
500 Fifth Avenue, 12th Floor  
New York, NY 10110  
Tel: (212) 382-3300  
Fax: (212) 382-0050  
dwollmuth@wmd-law.com  
fkessler@wmd-law.com  
sfitzgerald@wmd-law.com  
rkane@wmd-law.com

Norman E. Siegel (D. Kan. # 70354)  
Rachel E. Schwartz (Kan. # 21782)  
STUEVE SIEGEL HANSON LLP  
460 Nichols Road, Suite 200  
Kansas City, MO 64112  
Tel: (816) 714-7100  
Fax: (816) 714-7101  
siegel@stuevesiegel.com  
schwartz@stuevesiegel.com

*Attorneys for Plaintiff National Credit Union Administration Board*

cc: Counsel of Record (via ECF)